

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**

IN RE:

Michelle Quarles aka Michelle W. Quarles
Aka Michelle Washington Quarles
Debtor(s)

Case No. 17-15211-WIL
Chapter 11

RESPONSE TO DEBTOR'S OBJECTION TO CLAIM

COMES NOW, U.S. Bank Trust National Association as Trustee of Cabana Series III Trust (“Respondent”), by and through undersigned counsel and hereby responds to the Objection to Claim filed herein and in support thereof states as follows:

1. Respondent admits the allegations contained within Paragraph 1.
2. Respondent lacks information to either admit or deny the allegations set forth in paragraph 2.
3. Respondent admits the allegations contained within Paragraph 3.
4. In response to paragraph 4, Respondent states that the terms of the confirmed Chapter 11 Plan speak for themselves.
5. Respondent denies the allegations contained within Paragraph 5 insofar as they allege that Respondent has charged impermissible fees to the underlying loan.
6. Respondent lacks the information to either admit or deny the allegations set forth in paragraph 6.
7. Respondent lacks the information to either admit or deny the allegations set forth in paragraph 6.
8. The allegations set forth in paragraph 8 and 9 do not require a response.
9. Respondent is in the process of processing the filing of a transfer of claim from Wells Fargo Bank, N.A. to itself.

WHEREFORE, Respondent, by and through undersigned counsel respectfully requests that this honorable court deny the Objection to Claim and for such other and further relief as this court deems just and proper.

Respectfully Submitted,

/s/ Joshua Welborn, Esq. (Jwel)

Joshua Welborn, Esq.
Attorney for Movant
Bar No. 29359
McCabe, Weisberg & Conway, LLC
312 Marshall Avenue, Suite 800
Laurel, MD 20707
301-490-1196
bankruptcymd@mwc-law.com

CERTIFICATE OF SERVICE

I hereby certify that copies were sent electronically via the CM/ECF system on February 8, 2019 to:

Augustus T Curtis
Cohen, Baldinger & Greenfeld, LLC
2600 Tower Oaks Blvd.
Suite 103
Rockville, MD 20852
(301) 881-8300
Fax : (301) 881-8350
Email: augie.curtis@cohenbaldinger.com

Jeanne M. Crouse
6305 Ivy Lane
Suite 600
Greenbelt, MD 20770
(301) 344-6219
Fax : (301) 344-8431
Email: Jeanne.M.Crouse@usdoj.gov

/s/ Joshua Welborn, Esq.